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AT BALTIMORE
CLERK U.S. DISTRICT COURT
DISTRICT OF MARYLAND

DEPUTY

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA :

v.

OWEN JARBOE,
EVAN STRAUSS,
and
BRAYDEN GRACE,

Defendants.

: CRIMINAL NO. JRR-24-0023
: (Conspiracy, 18 U.S.C. § 371;
: Cyberstalking, 18 U.S.C.
: § 2261A(2)(B); Interstate Threatening
: Communication, 18 U.S.C. § 875(c);
: Interstate Threat Involving Fire or
: Explosives, 18 U.S.C. § 844(e);
: Forfeiture, 18 U.S.C. § 981(a)(1)(C), 18
U.S.C. § 982(a)(2)(B); 21 U.S.C. § 853,
28 U.S.C. § 2461(c))

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SUPERSEDING INDICTMENT

The Grand Jury for the District of Maryland charges that:

COUNT ONE

(Conspiracy)

At all times relevant to this Superseding Indictment:

1. Defendant **OWEN JARBOE** was a resident of Hagerstown, Maryland. **JARBOE** was a user of online messaging applications including Telegram and Instagram. His user names and monikers included “Doxlistic,” “Synthetics” and “yoboyqzippy.”

2. Defendant **EVAN STRAUSS** was a resident of Moneta, Virginia. **STRAUSS** was a user of online messaging applications including Telegram and Instagram. His user names and monikers included “Reaper,” “hells_ruin,” “ex_nightmare,” and “EXVG.”

3. Defendant **BRAYDEN GRACE** was a resident of Columbus, Ohio. **GRACE** was a user of online messaging applications including Telegram and Instagram. His user names and monikers included “Simswapplng,” “bit coin,” “user data god,” “Tuyal,” and “yahoo.emails.”

4. Conspirator #1 was a juvenile and a resident of Massachusetts. Conspirator #1 was a user of online messaging applications including Instagram and Telegram. His user names and monikers included “clinicallyinsaneog,” “ihy_bloodshed,” “bloodsheds,” and “bloodsheds ddd.”

5. Conspirator #2 was a juvenile and a resident of Massachusetts. Conspirator #2 was a user of online messaging applications including Instagram and Telegram. His user names and monikers included “boomidkfriend” and “Nyotblyat Nuttonmang.”

6. Conspirator #3 was a juvenile and a resident of North Carolina. Conspirator #3 was a user of online messaging applications including Instagram and Telegram. His user names and monikers included “mic_judge.”

7. “Swatting” is a term used to describe or refer to an incident in which an individual calls an non-emergency telephone number and falsely reports an emergency, often involving an act of violence that reportedly has or will occur at a particular location in order to elicit an armed law enforcement response to the location.

8. “Doxing” is a term used to describe the practice of searching for and publishing on the Internet personal, private or identifying information about an individual with malicious intent, such as the intent to provide such information for the purpose of swatting the individual.

The Conspiracy

9. Beginning on or before December 10, 2023, and continuing until at least January 18, 2024, in the District of Maryland and elsewhere,

**OWEN JARBOE,
EVAN STRAUSS,
and
BRAYDEN GRACE**

the defendants, and others known and unknown to the Grand Jury, did knowingly and unlawfully combine, conspire, confederate, and agree with each other to commit the following offenses:

- a. with intent to kill, injure, harass and intimidate another person did use an interactive computer service or electronic communication system of interstate commerce, or any other facility of interstate or foreign commerce to engage in a course of conduct that caused, attempted to cause, or would be reasonably expected to cause substantial emotional distress to another person, an immediate family of the person, or a spouse or intimate partner of the person in violation of 18 U.S.C. §2261A(2)(B);
- b. to knowingly and willfully transmit and cause to be transmitted in interstate commerce threats to injure the person of another in violation of 18 U.S.C. § 875(c); and
- c. to willfully make threats and maliciously convey false information, knowing the same to be false, concerning an attempt or alleged attempt being made, or to be made, to kill, injure or intimidate any individual or unlawfully to damage or destroy any building, vehicle, or other real or personal property by means of fire or an explosive through the use of the telephone

or other instrument of interstate or foreign commerce, or in and affecting interstate or foreign commerce, in violation of 18 U.S.C. § 844(e).

Object of the Conspiracy

10. The object of the conspiracy was to place swatting calls to police and other emergency departments in which one or more of the conspirators would falsely report that there was an emergency in the form of a violent act or acts at a particular location in order to cause an armed law enforcement response to the location with the intent to threaten, intimidate, and harass individuals and entities.

Manner and Means of the Conspiracy

11. It was a part of the conspiracy that the defendants and other conspirators were members of an online group known as Purgatory.

12. It was further part of the conspiracy that the defendants and other conspirators used multiple online messaging applications to privately communicate with each other about their efforts and plans to engage in doxxing and swatting activities.

13. It was further part of the conspiracy that the defendants and other conspirators would post photographs, news reports and messages on a public facing Telegram page for Purgatory, claiming responsibility for various swatting attacks and advertising their “swatting services.”

14. It was further part of the conspiracy that the defendants and other conspirators would use TextNow or Google Voice, which are Voice over Internet Protocol (VoIP) services that allow users to text and call any number in Canada and the United States, in order to place

swatting calls without disclosing their true telephone numbers and Internet Protocol (“IP”) addresses.

15. It was further part of the conspiracy that the defendants and other co-conspirators would create and share scripts to use when placing a swatting call.

Overt Acts

16. In furtherance of the conspiracy and to effect the objects of the conspiracy, at least one of the conspirators performed and caused to be performed one or more of the following overt acts, on or about the dates set forth below in Maryland and elsewhere.

a. On or about December 10, 2023, **STRAUSS**, using the moniker “hells_ruin,” posted “Welcome we are back purgatory has made a return and will be posted at the top as usual we are aliance [sic] with Hells Gates our other team. We thank you and always for support” in an Instagram group chat in which Conspirator #1, using the moniker “bloodsheds,” was a participant.

b. On or about December 15, 2023, **GRACE**, using the moniker “yahoo emails,” posted a swatting script and the message “My swat scripts are crazy. What I did will ... That’s how u get like a bomb squad and a few swat trucks” in an Instagram group chat in which Conspirator #1, using the moniker “bloodsheds,” was a participant.

c. On or about December 18, 2023, a conspirator created a public Telegram channel with the name “Purgatory” (the “Purgatory Telegram Channel”) in which **STRAUSS**, using the moniker “ex-nightmare,” was a participant, that contained the caption “WELCOME TO PURGATORY DOXXING AND SWATTING GROUP of 2024.”

d. On or about December 18, 2023, a conspirator created a private Telegram group chat with the name “PURGATORY Chat.”

e. On or about December 18, 2023, **GRACE**, using the moniker “bit coin,” created a private Telegram group chat with the name “bit & cursx/Mew & Nightwatch/Mew & extort, EX NIGHTMARE” which he then changed several minutes later to the name “purgatory GC” (the “Purgatory GC”).

f. On or about December 18, 2023, **GRACE**, using the moniker “bit coin,” posted in the Purgatory GC a link to the Purgatory Telegram Channel.

g. On or about December 18, 2023, **GRACE**, using the moniker “bit coin,” posted in the Purgatory GC: “But @everyone @Ex-Nightmare is owner im co-owner ... of purgatory” and “we taking this team to the next step.”

h. On or about December 31, 2023, **GRACE**, using the moniker “bit coin,” stated in in a private Telegram chat in which Conspirator #1, using the moniker “bloodshed ddd,” and **STRAUSS**, using the moniker “ex nightmare,” were participants: “btw u guys can do whatever to cursx aka zion.”

i. On or about January 1, 2024, **STRAUSS**, using the moniker “ex nightmare,” and **GRACE**, using the moniker “bit coin,” shared personal identifying information about Victim #1, who used the monikers “cursx” and “zion,” and Victim #1’s mother in a private Telegram chat.

j. On or about January 2, 2024, a conspirator posted on the Purgatory Telegram Channel a link to a website that contained personal identifying information about Victim # 1 and the following message: “FULL DOX ON [Victim #1] AKA CURSX ENJOY I WORKED HARD: MADE BY ME AND @Ex_nightmare.”

k. On or about January 2, 2024, a conspirator posted on the Purgatory Telegram Channel links to news reports, as well as a photograph of the law enforcement response to a swatting incident in Cowarts, Alabama, with the message:

zion we also had a little appearance by the men in camo get [expletive] you harmless freak thinking he could talk [expletive] without any consequences is appalling but makes our job a lot more fun when stuff like this happenes [sic] to our victims after they have a [sic] ego let's see him make a return in com PURGATORY FOREVER.

l. On or about January 3, 2024, Conspirator #3 used a TextNow telephone number to place a swatting call to the Houston County, Alabama Sheriff's Office in which he falsely claimed that he had shot a female in the face; that he had a firearm; and that he was holding a hostage at the address of Victim #1's residence in Newton, Alabama.

m. On or about January 3, 2024, a conspirator posted on the Purgatory Telegram Channel a screenshot of a chat regarding a swatting incident at a pizza restaurant with the message: "LOL who should be next on our list contact us with suggestions we don't do it for free comes with a fee."

n. On or about January 4, 2024, **STRAUSS**, using a Google Voice number, called the Newark, Delaware Police Department and falsely claimed that his name was Richard Willson; that he heard a man firing shots in the hallway at Newark High School; and that he was inside a classroom with ten other people.

o. On or about January 4, 2024, **JARBOE**, using the moniker "synthetics," sent a message to **GRACE** in the PURGATORY Chat, stating "you saw what me wnd [sic] nightmare did to the school. Post it in telegram chat," to which **GRACE**, using the moniker "bit coin," replied "yes."

p. On or about January 4, 2024, a conspirator posted links to news reports of a swatting incident at Newark High School in Newark, Delaware on the Purgatory Telegram Channel with the messages: “Purgatory is on the roll again” and “This was a school that was evacuated seems to some issues with it being on lockdown and not functioning properly!!”

q. On or about January 4, 2024, STRAUSS, using the moniker “ex nightmare,” posted a message in the PURGATORY Chat stating: “They still on lockdown,” to which Conspirator #3, using the moniker “mic_judge,” replied “LMAO … What was the script LOL.”

r. On or about January 5, 2024, Conspirator #2, using the moniker “Nyotblyat Nuttonmang,” posted in the PURGATORY Chat a script for a swatting call which included the name of Victim #3 as the alleged caller or shooter.

s. On or about January 5, 2024, Conspirator #3, using the moniker “Mic Judge,” posted in the PURGATORY Chat a script for a swatting call which included the name of Victim #1 as the caller.

t. On or about January 5, 2024, GRACE, using the moniker “bit coin,” posted in the Purgatory GC the address of the Hollywood Casino in Columbus, Ohio, the non-emergency telephone number for Columbus Police Department, and the name of Victim #1.

u. On or about January 5, 2024, Conspirator # 3, using the moniker “Mic Judge,” posted in the PURGATORY Chat: “It’s on [expletive] we got a casino With the name purgatory behind it.”

v. On or about January 5, 2024, Conspirator #2, using a TextNow telephone number, called the Columbus Police Department and threatened to blow up the Hollywood Casino in Columbus, Ohio unless authorities delivered \$100,000 to the casino.

w. On or about January 5, 2024, Conspirator #3, using a TextNow telephone number, called the Columbus Police Department and threatened to “start shooting,” to “kill everyone here” and to blow up the Hollywood Casino in Columbus, Ohio unless authorities delivered \$100,000 in cash and a helicopter to the casino.

x. On or about January 5, 2024, **GRACE**, using the moniker “user data god,” sent a private message on Instagram to **JARBOE** in which he stated: “Ayo we got a school to do tmr,” along with a Google Maps link to the address for Madison Vocational School in Roxbury, Massachusetts.

y. On or about January 7, 2024, a conspirator posted in the PURGATORY Chat: “LETS GET A HELL YEAH IF WE SHOULD SHUTDOWN A INTERNATINAL [sic] AIRPORT” to which **JARBOE**, using the moniker “synthetics,” replied: “bet ill do it tmr.”

z. On or about January 8, 2024, **JARBOE**, using the moniker “synthetics,” posted in the PURGATORY Chat: “I just swatted a [sic] airport.”

aa. On or about January 8, 2024, **GRACE**, using the moniker “bit coin,” posted in the PURGATORY Chat a screenshot of a message containing a link to a news report regarding the swatting of the Albany International Airport, and stated: “purgatory on top...”

18 U.S.C. § 371

COUNT TWO

(Cyberstalking)

The Grand Jury for the District of Maryland further charges:

1. The allegations in paragraphs 1 through 8 and paragraphs 10 through 16 are re-alleged and incorporated herein.
2. Between on or about January 2, 2024, and January 3, 2024, in the District of Maryland and elsewhere,

**OWEN JARBOE,
EVAN STRAUSS,
and
BRAYDEN GRACE**

the defendants, with the intent to kill, injure, harass, intimidate did use and cause to be used an interactive computer service or electronic communication system of interstate commerce, and any other facility of interstate or foreign commerce to engage in a course of conduct that caused, attempted to cause, or would be reasonably expected to cause substantial emotional distress to another person, an immediate family of the person, or a spouse or intimate partner of the person, to wit:

- a. **JARBOE**, using a TextNow telephone number, placed a call from the State of Maryland to the Houston County Sheriff's Department in Dothan, Alabama, in which he falsely reported that he was Victim #1; that he had shot his son; that he planned to burn down Lot 2 of a residential trailer park located on US 84 in Cowarts, Alabama; and that he was going to kill any law enforcement officials who responded to the trailer park;

- b. a conspirator posted on the Purgatory Telegram Channel links to news reports, as well as a photograph of the law enforcement response to the swatting incident in Cowarts, Alabama, with the message:

zion we also had a little appearance by the men in camo get [expletive] you harmless freak thinking he could talk [expletive] without any consequences is appalling but makes our job a lot more fun when stuff like this happens [sic] to our victims after they have a [sic] ego let's see him make a return in com PURGATORY FOREVER

and;

- c. Conspirator #3, using a TextNow telephone number, placed a call from the State of North Carolina to the Houston County Sheriff's Department in Dothan, Alabama, in which he falsely reported that he was located at Victim #1's residence, that he was in possession of a firearm, that he had shot one person in the face and was holding another person hostage.

18 U.S.C. § 2261A(2)(B)

COUNT THREE

(Threat to Damage or Destroy By Means of Fire)

The Grand Jury for the District of Maryland further charges:

1. The allegations in paragraphs 1 through 8 and paragraphs 10 through 16 are re-alleged and incorporated herein.

2. On or about January 2, 2024, in the District of Maryland and elsewhere,

**OWEN JARBOE,
EVAN STRAUSS,
and
BRAYDEN GRACE**

the defendants, did use and cause to be used an instrument of interstate and foreign commerce, and in and affecting interstate and foreign commerce, to willfully make a threat and maliciously convey false information knowing the same to be false, concerning an attempt or alleged attempt being made, or to be made, to kill, injure, and intimidate any individual and unlawfully to damage any building and other real and personal property by means of fire, to wit: a communication from the State of Maryland to the State of Alabama, in which defendant **OWEN JARBOE**, using a TextNow telephone number, called the Houston County, Alabama Sheriff's Office and threatened to burn down "Lot 2" in a residential trailer park located on US 84 in Cowarts, Alabama.

18 U.S.C. § 844(e)

COUNT FOUR

(Threat in Interstate Communication)

And the Grand Jury for the District of Maryland further charges:

1. The allegations in paragraph 1 through 8 and paragraphs 10 through 16 are re-alleged and incorporated herein.

2. On or about January 4, 2024, in the District of Maryland and elsewhere,

**OWEN JARBOE,
EVAN STRAUSS,
and
BRAYDEN GRACE**

the defendants, knowingly and willfully did transmit and cause to be transmitted in interstate and foreign commerce from the State of Maryland to the State of Delaware, a communication that contained a threat to injure the person of another, to wit: a communication in which defendant **OWEN JARBOE**, using a TextNow telephone number, called the Newark Police Department and threatened to shoot Victim # 2, who was a teacher at Newark High School, and to kill unnamed students.

18 U.S.C. § 875(c)

COUNT FIVE

((Threat to Damage or Destroy By Means of Explosive)

And the Grand Jury for the District of Maryland further charges:

1. The allegations in paragraph 1 through 8 and paragraphs 10 through 16 are re-alleged and incorporated herein.

2. On or about January 8, 2024, in the District of Maryland and elsewhere,

**OWEN JARBOE,
EVAN STRAUSS,
and
BRAYDEN GRACE**

the defendants, did use and cause to be used an instrument of interstate and foreign commerce, and in and affecting interstate and foreign commerce, to willfully make a threat and maliciously convey false information knowing the same to be false, concerning an attempt or alleged attempt being made, or to be made, to kill, injure, and intimidate any individual and unlawfully to damage any building and other real and personal property by means of an explosive, to wit: a communication in which defendant **OWEN JARBOE**, using a TextNow telephone number, called the Albany Police Department in Albany, New York and stated that he was going to go into the Albany International Airport to “shoot everybody up” and that his “friend” was going to set off bombs in the airport.

18 U.S.C. § 844(e)

COUNT SIX

(Threat in Interstate Communication)

And the Grand Jury for the District of Maryland further charges:

1. The allegations in paragraph 1 through 8 and paragraphs 10 through 16 are re-alleged and incorporated herein.
2. On or about January 15, 2024, in the District of Maryland and elsewhere,

**OWEN JARBOE,
EVAN STRAUSS,
and
BRAYDEN GRACE**

the defendants, knowingly and willfully did transmit and cause to be transmitted in interstate and foreign commerce from the State of Maryland to the State of Georgia, a communication that contained a threat to injure the person of another, to wit: a communication in which defendant **OWEN JARBOE**, using a TextNow telephone number, called Fire Station #2 in Eastman, Georgia, and claimed that he had shot his aunt and two juveniles and was considering shooting a third juvenile at an address on Fish Road in Eastman, Georgia.

18 U.S.C. § 875(c)

FORFEITURE NOTICE

1. Pursuant to Rule 32.2, Fed. R. Crim. P., notice is hereby given to the defendants that the United States will seek forfeiture as part of any sentence in accordance with 18 U.S.C. § 981(a)(1)(C), 18 U.S.C. § 982(a)(2)(B) and 28 U.S.C. § 2461(c), as a result of any defendant's conviction under Counts One, Three, Four, Five and Six of this Superseding Indictment.

Threat to Damage or Destroy by Means of Fire or Explosive

2. Upon convictions of the offenses alleged in Counts One, Three and Five of this Superseding Indictment,

**OWEN JARBOE,
EVAN STRAUSS,
and
BRAYDEN GRACE**

shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C), 18 U.S.C. § 982(a)(2)(B) and 28 U.S.C. § 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offenses or is facilitating property or property used in the offenses.

Interstate Threatening Communications

3. Upon convictions of the offenses alleged in Counts One, Four and Six of this Superseding Indictment,

**OWEN JARBOE,
EVAN STRAUSS,
and
BRAYDEN GRACE**

shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offenses.

Substitute Assets

3. If, as a result of any act or omission by any of the defendants, any of the property subject to forfeiture:
- a. cannot be located upon the exercise of due diligence;
 - b. has been transferred or sold to, or deposited with, a third party;
 - c. has been placed beyond the jurisdiction of the Court;
 - d. has been substantially diminished in value; or
 - e. has been commingled with other property which cannot be divided without difficulty,

the United States shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c).

18 U.S.C. § 981(a)(1)(C)
18 U.S.C. § 982(a)(2)(B)
21 U.S.C. § 853(p)
28 U.S.C. § 2461(c)

A TRUE BILL:

SIGNATURE REDACTED

for person _____

4/30/24
Date

Erek L. Barron /kog
Erek L. Barron
United States Attorney